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12 TARGET CORPORATION

13 UNITED STATES DISTRICT COURT
14 SOUTHERN DISTRICT OF CALIFORNIA
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17 JAMES WALTERS, an individual,
18 Plaintiff,
19 v.
20 TARGET CORP.,
21 Defendant.
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Case No. 3:16-cv-1678-L-MDD

NOTICE OF SETTLEMENT

1 Plaintiff James Walters and Defendant Target Corporation, through their
 2 respective undersigned counsel, hereby notify the Court that they have reached an
 3 agreement in principle to resolve this matter as well as the related and later filed
 4 *Dixon v. Target Corp.*, No. 18-cv-02660, (D. Minn.). The proposed settlement will
 5 be memorialized in a complete written settlement agreement and related documents,
 6 which the parties will file with the Court as part of a motion for preliminary
 7 approval pursuant to Rule 23 of the Federal Rules of Civil Procedure. The parties
 8 anticipate that the motion for preliminary approval will be filed in this Court in
 9 approximately 30 days.

10 Based on the foregoing, the parties respectfully request that all current
 11 deadlines set forth in the Court's Briefing Schedule (ECF No. 145) and decisions
 12 on the pending Motion for Summary Judgment (ECF No. 90) and Motion for Class
 13 Certification (ECF No. 98) be suspended.

14 Dated: April 29, 2019

MORRISON & FOERSTER LLP

16 By: /s/James R. McGuire
 17 James R. McGuire

18 Attorneys for Defendant
 TARGET CORPORATION

19 Dated: April 29, 2019

KALIEL PLLC

21 KOPELOWITZ OSTROW
 FERGUSON WEISELBERG GILBERT

23 By: /s/ Jeff Ostrow
 24 Jeff Ostrow

25 Attorneys for Plaintiff
 JAMES WALTERS

ECF ATTESTATION

Pursuant to local rules I, James R. McGuire, attest that Jeff Ostrow—the other signatory listed in the foregoing document, and on whose behalf the document is being submitted—concurs in the document’s contents and has authorized its filing.

/s/ James R. McGuire
James R. McGuire